

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

In re:)	
)	
MICHAEL CHRISTOPHER SPRAGUE and)	Chapter 13
DAWN MARIE SPRAGUE,)	Case No: 19-10835-SDB
)	
Debtors.)	

AMENDED MOTION TO APPROVE SETTLEMENT
AND FOR ORDER APPROVING FEES AND DISBURSEMENT OF FUNDS

COME NOW the Debtors in the above styled action, MICHAEL CHRISTOPHER SPRAGUE and DAWN MARIE SPRAGUE, by and through counsel, and move this Honorable Court to approve a settlement and disbursement of funds and would show the following:

1. Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on July 1, 2019.
2. Around the time of the filing of the bankruptcy petition, Debtor Michal Sprague's tractor trailer encountered mechanical problems and Mr. Sprague brought claims related to the mechanical problems.
3. Debtor hired special counsel Nathan E. Huff to represent him in prosecuting claims against the alleged liable party – Vanguard Truck Centers, LLC, and Nathan E. Huff is qualified and capable of handling this type of legal action.
4. Debtor has agreed to settle with the alleged liable party. Said liable party disclaims any wrongdoing as alleged in the lawsuit.
5. Debtor and special counsel entered into a fee agreement attached hereto as Exhibit "A". Pursuant to the fee agreement, Debtor requests that the Court Order the following

disbursements: \$10,138.88 to Debtor Michael Christopher Sprague and \$4,861.12 to Nathan E. Huff, Cleary, West & Huff, LLP for reasonable attorneys' fees and expenses (\$4,500.00 in attorneys' fees and \$361.12 for out-of-pocket expenses incurred).

6. Debtor believes that the attorney fees and disbursement of funds set forth in the proposed order are reasonable and fair under the circumstances of his case.

7. This settlement should not affect Debtors' present or future ability to fund the Chapter 13 Plan.

WHEREFORE, Debtors respectfully move that this Honorable Court approve the settlement as set forth in this motion and for an order directing disbursement of funds and for such other relief as is just and proper in this case.

Respectfully submitted,

/s/ Nathan E. Huff

Nathan E. Huff

Georgia Bar No. 773611

Special Counsel for Michael Sprague

Cleary, West & Huff, LLP
1223 George C. Wilson Dr.
Augusta, GA 30909
(706) 860-9995

CERTIFICATE OF SERVICE

This is to certify that I, Nathan E. Huff, have this day served a true and correct copy of the within and foregoing "MOTION TO APPROVE SETTLEMENT AND FOR ORDER APPROVING FEES AND DISBURSEMENT OF FUNDS" upon the following parties either electronically, via CM/ECF electronic transmission, or by United States Mail, postage prepaid, as follows:

Huon Le
Chapter 13 Trustee
[VIA CM/ECF]

Charles W. Wills, Esq.
John P. Wills, Esq.
Attorneys for Debtor
[VIA CM/ECF]

This 3rd day of April, 2023.

/s/ Nathan E. Huff
Nathan E. Huff